



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

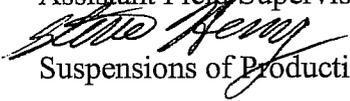
IN REPLY REFER TO:
PAS 1796.2166.2933

December 10, 2004

Memorandum

To: Chief, Office of Environmental Evaluation, Minerals Management Service,
Camarillo, California

From: Assistant Field Supervisor, Ventura Fish and Wildlife Office, Ventura, California

Subject:  Suspensions of Production for Aera Energy LLC

The Fish and Wildlife Service (Service) has reviewed the draft environmental assessment for proposed Suspensions of Production for Aera Energy LLC (Aera), dated November 17, 2004. Pursuant to the Outer Continental Shelf Lands Act, as amended, the Minerals Management Service (MMS) is required to balance expeditious and orderly mineral resource development with the protection of the human, marine, and coastal environment. Granting the suspensions would allow Aera time to conduct shallow hazard surveys and biological surveys on the Point Sal and Purisima Point Units and to conduct administrative activities leading to the submittal of revised exploration plans to the MMS. No physical activities would occur on the remaining offshore units or one non-unitized lease during the suspension period. All surveys would be conducted offshore of northern Santa Barbara County.

Shallow hazard surveys are high-resolution site surveys that are conducted to investigate the shallow subsurface for geohazards and soil conditions in relatively small areas. Aera's shallow hazards survey would be conducted in five defined areas that range in size from 4-5 square kilometers (1.5-2.0 square miles). Shallow hazard surveys are typically conducted by survey vessels that measure 37-47 meters (121-154 feet) in length. A typical operation consists of a ship towing an air gun about 25 meters (82 feet) behind the ship and a 600 meters (1,969 feet) streamer cable with a tail buoy. The ship travels at 3.0-3.5 knots (5.6-6.5 kilometers per hour), and the air gun is fired every 7-8 seconds. Geotechnical information is typically collected from the sea floor to a depth of 300-450 meters (980-1,475 feet).

The MMS has determined that the brown pelican (*Pelecanus occidentalis californicus*) could be potentially impacted by the shallow hazards and biological surveys that would take place during the suspension period. The activities associated with these surveys that could have an effect on the brown pelican include vessel traffic and use of a single air gun during the shallow hazards surveys. Vessel traffic could be a problem if it were in close proximity to nesting birds or were in an area where no traffic had occurred previously. However, no marine birds including the brown pelican nest in the vicinity of the surveys, and vessel traffic of various types is common throughout the area. Therefore, no effects on the brown pelican are expected from survey-related

vessel traffic. Although it is possible that a brown pelican may be affected by the impulsive sounds produced during the shallow hazards survey if a pelican were to dive immediately adjacent to the air gun, this impact is considered highly unlikely. Therefore, no effects on brown pelicans are expected from the shallow hazards surveys.

The MMS has determined that the activities associated with the shallow hazards and biological surveys that potentially could have an effect on the southern sea otter (*Enhydra lutris nereis*) include vessel traffic and use of a single air gun during the shallow hazards surveys. Although sea otters may allow close approaches by boats, they tend to avoid heavily disturbed areas (Richardson et al., 1995). Garshelis and Garshelis (1984) reported that sea otters in southern Alaska tend to avoid areas with frequent boat traffic, but will reoccupy those areas in seasons with less traffic. Vessel traffic of various types is common throughout the survey area. Therefore, no effects on the southern sea otter are expected from survey-related vessel traffic. The southern sea otters that have been observed on an irregular basis in the vicinity of Point Conception since 1995 were located within 0.4 kilometers (0.25 miles) of the shoreline, in the surf zone, and/or amongst the coastal kelp beds. For the most part, sea otters generally prefer to feed in relatively shallow (<20 meters) water, but may dive to depths of 30-40 meters (100-120 feet) in search of food. The shallow hazard survey sites are located 8-18 kilometers (5-11 miles) from the coast at depths from about 61-122 meters (200-400 feet) of water. Reidman (1983) found that sea otters were not disturbed, did not relocate, and continued normal reproductive and feeding behavior when exposed to the acoustic energy/sound generated by an experimental air gun. Based on the location of the surveys in relation to sea otter habitat and findings by Reidman (1983), no effects on the southern sea otter are expected from the shallow hazards surveys.

From these analyses, the MMS has concluded that the activities associated with the shallow hazards and biological surveys that would take place during the suspension period, will not adversely affect the brown pelican or the southern sea otter. The Service concurs with these findings.

This concludes our informal consultation for this project. Please contact Greg Sanders, at (805) 644-1766 should you have any questions with regard to this memorandum.

References

- Garshelis, D.L. and J.A. Garshelis. 1984. Movement and management of sea otters in Alaska. *J. Wildlife Manager* 48:665-678.
- Richardson, W.J. 1995b. Chapter 9, Documented disturbance reactions. Pp. 241-324. *In*: W.J. Richardson, C.R. Greene, Jr., C.I. Malme, D.H. Thomson (eds.), *Marine Mammals and Noise*. Academic Press, New York.
- Riedman, M.L. 1983. Studies of the effects of experimental noise associated with oil and gas exploration and development on sea otters in California. Report by the Center for Coastal Marine Studies, University of California, Santa Cruz, for U.S. Department of the Interior, Minerals Management Service, Anchorage, Alaska. NTIS B86-218575.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

DEC 16 2004

In Reply, Refer to:
151405SWR2004PR20160:MLD

Mr. Maurice Hill
Minerals Management Service
Attn: Suspension-EA Comments
Office of Environmental Evaluation
770 Paseo Camarillo
Camarillo, California 93010-6064

Dear Mr. Hill:

This letter responds to your request for the National Marine Fisheries Service (NOAA Fisheries) to review the Draft Environmental Assessment (Draft EA) for Samedan Oil Corporation's (Samedan) Suspension of Production (SOP) for 37 months within the Gato Canyon Unit, located in the western Santa Barbara Channel offshore in Santa Barbara County. NOAA Fisheries also reviewed the Draft EA for Aera Energy LLC's (Aera) SOP for 31 months within the Point Sal Unit and for 34 months within the Purisma Point, Lion Rock and Santa Maria Units, located offshore in northern Santa Barbara County. NOAA Fisheries has prepared the following comments based under the statutory authorities of the Endangered Species Act, the Marine Mammal Protection Act, and the Magnuson-Stevens Fishery Conservation and Management Act.

Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA)

Section 7 of the ESA (16 U.S.C. § 1536(a)(2)) requires Federal agencies to consult with the Secretary of Commerce (delegated to NOAA Fisheries) to insure that "any action authorized, funded, or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered species or threatened species . . ." See also 50 C.F.R. part 400.

In addition, whales, dolphins, seals and sea lions are protected under the MMPA and managed under the jurisdiction of NOAA Fisheries. See 16 U.S.C. § 1361 *et seq.* According to the MMPA, it is illegal to "take" a marine mammal without prior authorization from NOAA Fisheries. "Take" is defined as harassing, hunting, capturing, or killing, or attempting to harass, hunt, capture, or kill any marine mammal. "Harassment" is defined as any act of pursuit, torment, or annoyance which has the potential to injure a marine mammal in the wild, or has the potential to disturb a marine mammal in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering.



In general, NOAA Fisheries concurs with the effects analysis, monitoring and mitigation measures described in the Draft EAs for Samedan and Aera to identify and minimize impacts to marine mammals and sea turtles. Please note that there have been extensive studies of the impacts of seismic surveys on pinnipeds and whales conducted in the late 1990s and beyond and should be included in the final analysis (e.g., LGL Limited environmental research associates; LGL Report TA2230-3; May 1999).

We provide the following specific recommendations for marine mammals and sea turtles based on the information provided in the Draft EA for Samedan. Note that these recommendations can be applied to the Draft EA for Aera, as well.

1. Page 4-14: "The 'taking' of a marine protected species constitutes an insignificant, adverse impact." This sentence likely refers to the number of animals "taken" as being insignificant to the overall population number, not that the activity that caused the take is insignificant. This should be described in more detail as the concept is mentioned throughout the document.
2. Page 4-21: Please note that at 160dB re 1 μ Pa [rms]¹ marine mammals have shown a behavioral response to received sound pressure levels of underwater noise.
3. Page 4-21: "Animals entering the 160dB impact zone may be harassed, amounting to an insignificant impact." If animals are harassed, then by definition this constitutes a "take" as defined under the MMPA, and authorization from NOAA Fisheries would be required. We recommend changing the first two sentences referenced above to read as follows: "If no marine mammals occur in the 160dB impact zone, then the animals are not likely to be harassed by the air gun."
4. Page 4-21: Please change the following sentence to read as: "The stranding of multiple animals of the same strategic marine mammal stock or endangered or threatened species may result in a significant impact to the overall population."
5. Page 4-22: In reference to the "appropriate harassment authorization," please note that the permitting process will take some time and we advise the applicant to apply at least 8 months prior to the intended start date.
6. Page 4-22: Please clarify if air gun will be ramped up every time it is stopped.
7. Page 4-23 (MPS-3): We recommend changing NOAA "certified" observer to NOAA "approved" observer.

8. In addition to mitigation measures proposed in the Draft EA, vessel operators should adhere to the following guidelines:
- Do not:**
- ▶ Move into the path of a whale;
 - ▶ Move faster than a whale;
 - ▶ Make rapid speed or erratic directional changes, UNLESS to avoid collision with a whale;
 - ▶ Get between two whales;
 - ▶ Chase whales
9. Page 4-24 (MPS-12): Please add; "In the unlikely event of a watercraft collision with a marine mammal, officials must immediately contact the NOAA Fisheries Stranding Coordinator, Joseph Cordaro, at (562) 980-4017."

In conclusion, based on the mitigation and monitoring requirements outlined in the Draft EA, NOAA Fisheries concurs with the determination that the proposed actions may affect, but are not likely to adversely affect marine mammals and sea turtle species listed under the ESA and under the jurisdiction of NOAA Fisheries.

Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA)

Pursuant to section 1855(b)(2) of the MSFCMA, Federal agencies are required to consult with the Secretary of Commerce (delegated to NOAA Fisheries) with respect to "any action authorized, funded, or undertaken, or proposed to be authorized, funded, or undertaken, by such agency that may adversely affect any essential fish habitat identified under this Act." In addition, the MSFCMA provides that the Secretary of Commerce "shall coordinate with and provide information to other Federal agencies to further the conservation and enhancement of essential fish habitat." See 16 U.S.C. § 1855(b)(1)(D).

The Pacific Fishery Management Council has identified and described Essential Fish Habitat (EFH) for fishes managed under the Pacific Groundfish Fishery Management Plan (FMP), the Highly Migratory Species FMP, and the Coastal Pelagic Species FMP, many of which may occur in the vicinity of the project area.

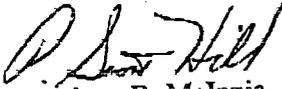
Granting the SOP would permit Samedan to conduct a shallow hazards survey on the Gato Canyon Unit and conduct administrative activities leading to the submittal of a revised Exploration Plan (EP) to MMS for subsequent technical and environmental review. The shallow hazards survey will be conducted within a two square kilometer area and will take approximately 3-4 days. A single small air gun (20-in³) would be used as the acoustic source, which produces a sound intensity level of 218 dB re 1 μ Pa [rms]¹ and is deployed about three meters below the surface.

Granting the SOP would permit Aera to conduct a shallow hazards survey on the Point Sal and Purisma Units and conduct administrative activities leading to the submittal of a revised Exploration Plan (EP) to MMS for subsequent technical and environmental review. The shallow hazard surveys would cover an area that totals approximately 21-26 square kilometers and would take approximately 11-13 days. A single small air gun (20-in³) would be used as the acoustic source, which produces a sound intensity level of 218 dB re 1 μ Pa [rms]¹ and is deployed about three meters below the surface.

The proposed shallow hazards surveys occur within EFH for Federally managed fish species in the Coastal Pelagics and Pacific Groundfish FMPs, as defined in MSFCMA. Potential adverse effects may occur as a result of the acoustic energy generated by the air gun. However, the risk of mortality or sub-lethal effects on fish and shellfish would be limited to eggs and larvae, the random juveniles or adult fish, juvenile fish associated with the occasional moving kelp mat, or small portions of fish schools that may occur within 6 meters of the air gun when shooting begins. Given the relatively small survey area and brief survey period, the proposed projects will only have minimal effects to EFH. Therefore, NOAA Fisheries does not object to the issuance of the SOPs for Samedan and Aera pursuant to the MSFCMA.

Thank you for coordinating with NOAA Fisheries regarding these marine events. Please contact Monica DeAngelis at 562-980-3232 or Monica.DeAngelis@noaa.gov if you have any questions concerning this letter.

Sincerely,


Rodney R. McInnis
Regional Administrator

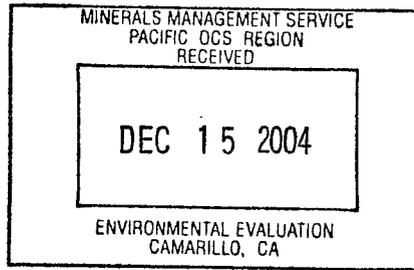
cc:

Ann Bull, MMS-Office of Environmental Evaluation, Camarillo, California
Jeff Childs, MMS-Alaska Outer Continental Shelf Region, Anchorage, Alaska
Christina Fahy, NOAA Fisheries-SWR
Bryant Chesney, NOAA Fisheries-SWR

SAMEDAN OIL CORPORATION
1224 Coast Village Circle, Suite 36
Santa Barbara, California 93108 - 3788
(805) 565 - 2234 FAX (805) 565- 2236

December 14, 2004

Minerals Management Service
Attn: Suspension – EA Comments
Office of Environmental Evaluation
770 Paseo Camarillo
Camarillo, CA 93010-6064



RE: Gato Canyon Unit Leases OCS-P 0460 and P 0464,
11/17/04 Draft Environmental Assessment Addressing Suspension of
Production for Samedan Oil Corporation Operated Acreage

Gentlemen:

Samedan Oil Corporation (Samedan) has reviewed the draft Environmental Assessment (EA) for the Gato Canyon Unit and hereby provides two comments on the assessment of the proposed shallow hazards survey. Samedan submits these comments without waiving any of the rights of the lessees of the unit and leases listed above, and specifically without waiving their assertion that the application of the 1990 CZMA amendments to the undeveloped offshore California leases constituted a material breach of those leases as asserted in the *Amber Resources* case.

On page 4-26 in the last paragraph and continued on to page 4-27 the EA indicates that Aera Energy and Samedan (now Noble) may share the use of the shallow hazards survey vessel and equipment in 2005. All other mentions in the draft EA of the timing of the survey for the Gato Canyon Unit are for 2006. In further support of this timing the draft EA states that the Minerals Management Service anticipates the updated SOP will become effective July 2005. Both Aera's and Samedan's April 2004 SOP updates state that an SOP effective date of July 2005 would result in shallow hazard surveying during 2006, not 2005. Therefore, the reference to 2005 survey timing in the draft EA should be corrected to read 2006.

Secondly, the combination of three mitigations described in the draft EA could adversely affect shallow hazard surveying:

- MPS-1 states that the air gun will be turned off during the period in which the vessel makes its turn to move from one line to the next.
- MPS-14 states that Samedan shall not operate the air gun in water in areas beyond the boundary of those areas for which surveys are permitted for.
- MPS-15 states that Samedan shall, as possible, ramp-up the air gun to operating levels at a rate not to exceed 6 dB per minute from 160 dB to operating level at

the start of operations or testing, when beginning a new trackline or anytime after the air gun is powered down below 160 dB.

Based on past experience, we can report that it is not operationally feasible for a survey boat to physically stop at the edge of the survey area prior to beginning each trackline in order to perform the ramp-up procedure. In addition, coming to a halt could compromise the position integrity of the cable streaming behind the boat. If no firing is allowed outside the survey area, under these mitigations, the ramp-up process would have to occur within the area to be surveyed. This will result in a portion of each line being shot with an under-powered source. Therefore, part of the survey area would not be fully sampled, placing the survey results in conflict with the requirements in NTL 98-12 that governed Samedan's 2001 shallow hazards survey execution plan. However:

1. When the survey boat finishes a line, the air gun can either be turned off until the turn is completed, or powered down to 160 dB during the turn. Then, the air gun can be ramped-up, per the mitigation schedule, in a 'buffer' area preceding the next line to be surveyed. The buffer need only be as long as is necessary to ramp-up the air gun from 160 dB to operational levels, estimated to be approximately 0.7 nautical miles.
2. In the alternative, survey areas can be increased to incorporate a 'ramp-up buffer' zone.

Please feel free to contact this office at (805) 565-2234 should you have any questions regarding the above matters.

Sincerely,
SAMEDAN OIL CORPORATION



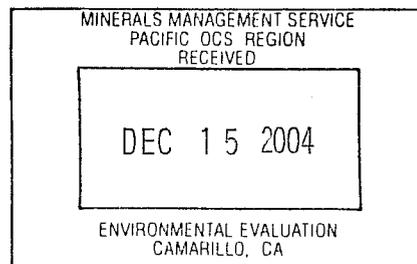
Ronald G. Heck
California Offshore Projects Coordinator

December 14, 2004



VIA OVERNIGHT DELIVERY

Minerals Management Service
Attn: Suspension – EA Comments
Office of Environmental Evaluation
770 Paseo Camarillo
Camarillo, CA 93010-6064



Gentlemen:

SUBJECT: PL-90029, POINT SAL UNIT
PL-90030, PURISIMA POINT UNIT
PL-90032, SANTA MARIA UNIT
PL-70080, LION ROCK UNIT
OS-07001, LEASE OCS-P 0409
OFFSHORE SANTA MARIA BASIN (OSMB)
OFFSHORE CALIFORNIA
11/17/04 Draft Environmental Assessment Addressing Suspensions of
Production for Aera Energy LLC (Aera) Operated Acreage

Aera has reviewed the draft Environmental Assessment (EA) for Aera's subject acreage and hereby provides two comments. Aera submits these comments without waiving any of the rights of the lessees of the units and lease listed above, and specifically without waiving their assertion that the application of the 1990 CZMA amendments to the undeveloped offshore California leases constituted a material breach of those leases as asserted in the *Amber Resources* case.

First, paragraph five on page 4-27 of the subject draft EA states that Samedan has submitted a proposal to conduct shallow hazard surveys on the Gato Canyon Unit between July and December 2005. A similar statement in the Gato Canyon draft EA appears on page 4-26 referencing Aera's survey timing. The draft EA's further state that the Minerals Management Service anticipates the updated SOP's will become effective July 2005. Both Aera's and Samedan's April 2004 SOP updates state that an SOP effective date of July 2005 would result in shallow hazard surveying during 2006, not 2005. Other discussions of the shallow hazard surveys in the draft EA's correctly state this 2006 timing. Therefore, the noted reference to 2005 survey timing in the draft EA's should be corrected to read 2006.

Secondly, the combination of three mitigations described in the draft EA could adversely affect shallow hazard surveying:

- MPS-1 states that the air gun will be turned off during the period in which the vessel makes its turn to move from one line to the next.
- MPS-14 states that Aera shall not operate the air gun in water in areas beyond the boundary of those areas for which surveys are permitted for.
- MPS-15 states that Aera shall, as possible, ramp-up the air gun to operating levels at a rate not to exceed 6 dB per minute from 160 dB to operating level at the start of operations or testing, when beginning a new trackline or anytime after the air gun is powered down below 160 dB.

Based on Aera's past experience, we can report that it is not operationally feasible for a survey boat to physically stop at the edge of the survey area prior to beginning each trackline in order to perform the ramp-up procedure. In addition, coming to a halt could compromise the position integrity of the cable streaming behind the boat. If no firing is allowed outside the survey area, under these mitigations, the ramp-up process would have to occur within the area to be surveyed. This will result in a portion of each line being shot with an under-powered source. Therefore, part of the survey area would not be fully sampled, placing the survey results in conflict with the requirements in NTL 98-12 that governed Aera's 2001 shallow hazards survey execution plan. However:

1. When the survey boat finishes a line, the air gun can either be turned off until the turn is completed, or powered down to 160 dB during the turn. Then, the air gun can be ramped-up, per the mitigation schedule, in a 'buffer' area preceding the next line to be surveyed. The buffer need only be as long as is necessary to ramp-up the air gun from 160 dB to operational levels, estimated to be approximately 0.7 nautical miles.
2. In the alternative, survey areas can be increased to incorporate a 'ramp-up buffer' zone.

Please feel free to contact this office at 661/665-5515 should you have any questions regarding the above matters.

Very truly yours,



T. E. Enders
Land Representative
Coastal Asset

Cc:

Delta Petroleum Corp.
Attn: Mr. Roger Parker
475 17th Street, Ste. 1400
Denver, CO 80202

Plains Exploration & Production Company
Attn: Mr. Thomas M. Gladney
700 Milam, Ste. 3100
Houston, TX 77002-2815

Ogle Petroleum Inc.
Attn: Mr. Ron Heck
1224 Coast Village Circle, Ste. 36
Santa Barbara, CA 93108

OLAC Resources, LLC
Attn: Mr. Flint Ogle
743 Horizon Ct., Ste. 368
Grand Junction, CO 81506

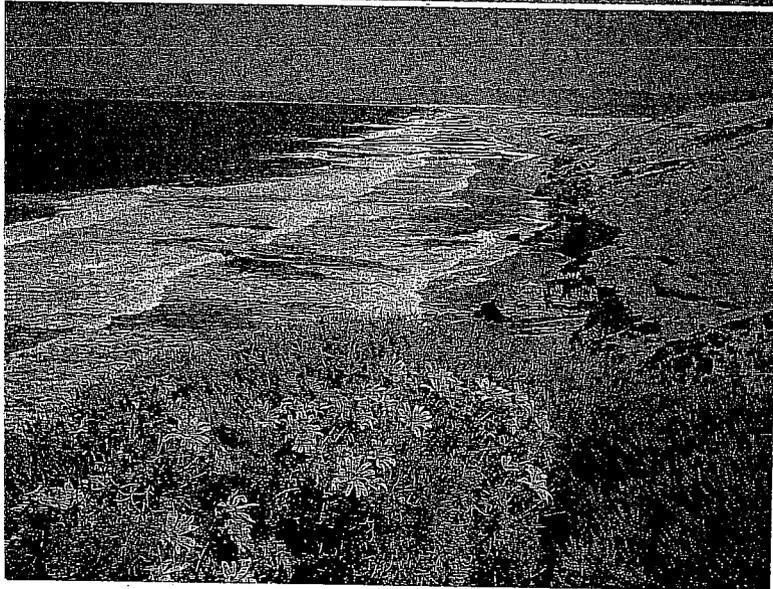
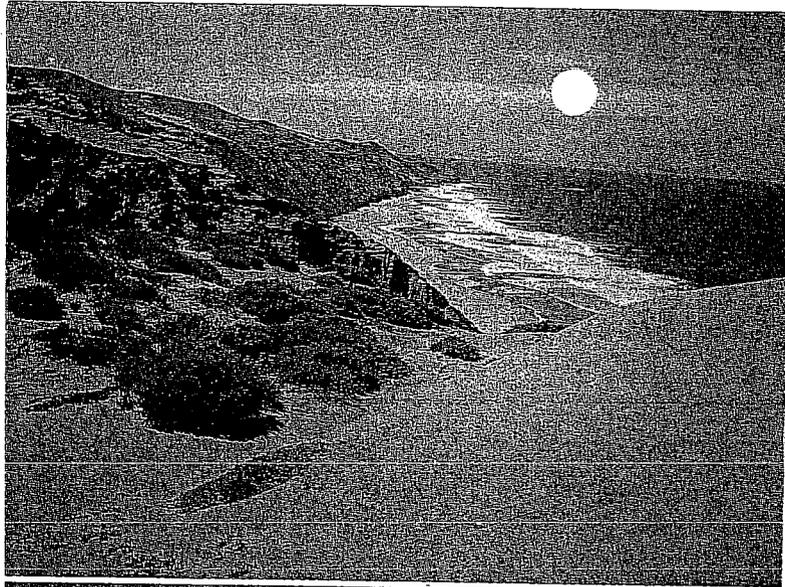
Samedan Oil Corporation
Attn: Mr. Cam Countryman
100 Glenborough Dr., Ste. 100
Houston, TX 77067-3610

Anadarko E & P Company
Attn: Mr. Rick A. Mayer
1201 Lake Robbins Drive
The Woodlands, TX 77380

Devon Energy Production Co., L.P.
Attn: Mr. Glen Maynard
20 N. Broadway, Ste. 1500
Oklahoma City, OK 73102

TotalFinaElf E & P USA, Inc.
Attn: Mr. Mark Gregory
800 Gessner, Ste. 700
Houston, TX 77024

RAM Energy, Inc.
Attn: Mr. Drake Smiley
5100 E. Skelly Dr., Ste. 650
Tulsa, OK 74135-6549





Citizens For A Vehicle Free Nipomo Dunes

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- Ann Hudak
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- Pat Mastan
- Mary Smith
- J. Wee Kemp
- Merci Niles
- Orval Osborne
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- Mike Mattison
- Anastasia Bell
- Larry Spanne
- Mike Zarate
- Frank Maurer
- Olane Long
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- Susan Mullen
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- Nell Langford
- John Beccia
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- Sienn Paterson
- Dirk Walters
- Jerald Mullen
- David Morrow
- Anita Judd
- Coralie McMillan
- Olne Hayward

TO: MINERAL MANAGEMENT
SERVICE
RE: OIL RIGS OFF CENTRAL
COAST

We do NOT want to
see any oil rigs off
our coast! We enjoy
looking west to the
wide Pacific without
the clutter of ugly
oil rigs.

Please - No Oil Rigs

William J. Dannen
Executive Director

O.H.V. Riding Areas in California

- *Coral Canyon, Cleveland National Forest, 1,800 Acres
 - *Little Rock, Angeles National Forest, 46 Acres
 - *Rowher Flat, Angeles National Forest, 145 Acres
 - *San Gabriel Canyon, Angeles National Forest, 180 Acres
 - *Wildomar, Cleveland National Forest, 340 Acres
 - *Buttercup Valley, BLM - El Centro Resource Area Office, 30,000 Acres
 - *Dove Springs, BLM - Ridgecrest Resource Area Office, 161 Acres
 - *Dumont Dunes, BLM - Barstow Resource Area Office, 2,200 Acres
 - *El Mirage, BLM - Barstow Resource Area Office, 10,400 Acres
 - *Glamis/Gecko, BLM - El Centro Resource Area Office, 149,000 Acres
 - *Jawbone, GLM - Ridgecrest Resource Area Office, 133 Acres
 - *Johnson Valley, BLM - Barstow Resource Area Office, 261 Acres
 - *Mammoth Wash, BLM - El Centro Resource Area Office, 8,000 Acres
 - *Plaster City, BLM - El Centro Resource Area Office, 100,000 Acres
 - *Razor, BLM - Barstow Resource Area Office, 32 Acres
 - *Rice Valley Dunes, BLM - Palm Springs - South Coast Resource Area Office, 4,000 Acres
 - *Spangler Hills, BLM - Ridgecrest Resource Area Office, 2,000 Acres
 - *Stoddard Valley, BLM - Barstow Resource Area Office, 125 Acres
 - *Ocotillo Wells, California Dept. of Parks & Recreation, 4,000 Acres
 - *Hungary Valley, California Dept. of Parks & Recreation, 5,100 Acres
 - *Pismo Dunes, California Dept. of Parks & Recreation, 2,000 Acres
 - *Moabi Regional Park, San Bernardino County, 65 Acres
- Total Acres: 319,988**

- Greg Hock
- Mary Simmons
- Theresa Guinn
- Michela Anderson
- Merien Nelson
- Monice Harrie
- Kathryn Schmidt
- Elaine Genson
- Susan Johnson
- Darlene Gastineau
- Jodi Teller
- Christine Paralta
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- Laure Mason
- Tina Oglesby
- Gary Hamer
- Jeff Carne
- Jeniene Canoz
- Vince Duffy
- Andrea Parker
- Edward Chu
- Douglas Melis
- Gina Whitaker
- Laurel Stephens
- Sharon Roundtree
- Tanya Pelez
- Chris Barrett
- Dana Wright
- Carol Berger
- Michael McMillan
- Lisa Valtender
- Stan Williams
- Laurel Gilliese
- Suzanne Lord
- Eric Foster
- Valerie Von Burg
- Helen Ellis
- Eric Greening
- Wendy Whitaker
- Janeane Haddix
- Nancy Henry
- Krish Dev
- Mary Ann Foster
- Laurence Laurent
- Lily Strasser
- Leslie Beth Neely
- Coralie McMillan
- Edith Schnader
- Yolander Waddell
- Hilary White
- Bev Sessa
- Steve Dauber
- Cindy Kappner
- Dalya Robson
- Jaess Analdi

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DEC 13 2004

ENVIRONMENTAL EVALUATION
SANTA BARBARA



Mr. William L. Dannen
1040 Cielo Ln
Nipomo CA 93444-9039

SAY NO TO OFFSHORE OIL!

You are invited to comment on the offshore oil drilling projects being proposed, including alternatives to drilling along our coast.

The Minerals Management Service (MMS) is preparing an Environmental Impact Statement to determine the potential impacts of multiple offshore oil and gas drilling projects proposed for the Santa Maria Basin and western Santa Barbara Channel.

The Environmental Center of San Luis Obispo County (ECOSLO) wants to see these waters designated the Central Coast National Marine Sanctuary. ECOSLO further supports the buy-back of all active oil and gas leases in this area by the federal government. This is an area of significant natural resources, including diverse marine mammal and fish populations. Protection is warranted due to the great scientific and aesthetic values as well.

Please join us in resisting offshore oil drilling



— **SIERRA CLUB MEETING** —

Thursday, January 18

Wesley Room, United Methodist Church

1515 Fredericks Street, SLO

6:30pm - MMS Discussion

7:00pm - General Meeting

— **MMS PUBLIC MEETING** —

Monday, January 22

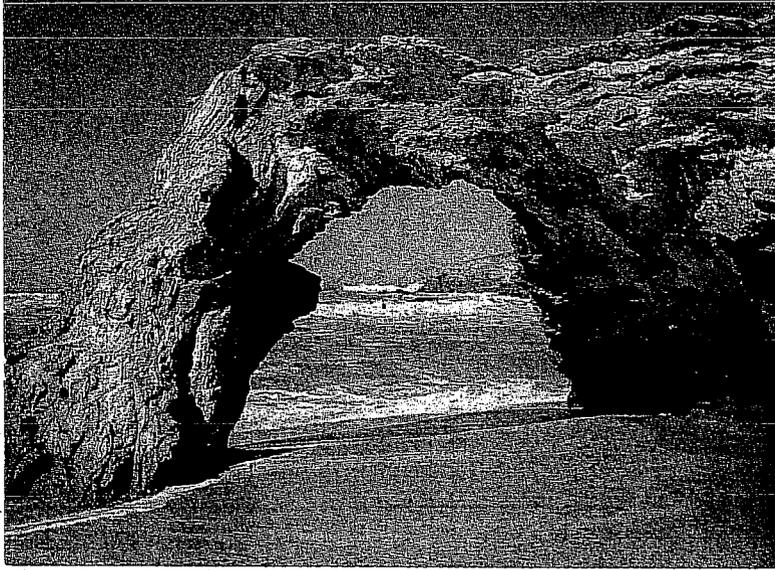
Alan Hancock College, Marian Theater, Bldg. D

800 S. College Drive, Santa Maria

5:30pm - Discussions & Presentations

7:15pm - Open Microphone w/facilitator







Citizens For A Vehicle Free Nipomo Dunes

P.O. Box 73 • Nipomo, California 93444-0073

**TO: MINERAL MANAGEMENT
SERVICE
RE: OIL RIGS OFF CENTRAL
COAST**

We do NOT want to see any oil rigs off our coast! We enjoy looking west to the wide Pacific without the clutter of ugly oil rigs.

Please - No Oil Rigs

*William J. Denneen
Executive Director*

**INSPIRATIONAL
CHAIRMAN**
Ian McMillan
EXECUTIVE DIRECTOR
Bill Denneen

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Lois Barber
Betty Schetzer
Eva Betz
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Virginia Elliott
Marry Snerra
Luis Escobar
Kerrie Palermo
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Peg Pinand
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Pati Maesten
Mary Smith
J. Wes Kemp
Mardi Niles
Orval Osborne
Bruce Raley
Leon Smith
Ann Hudak
Sandy Young
Mike Mettison
Livia Kellerman
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Anica Hurley
Sandy Schweiger
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David Stroup
David D. Morrow
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Lisa Van Der Stad
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Tracy Rockwell
Donna Miller
Steve O'Neill
Susan Cees
Joyce Malone
Suzy Flicker
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Laura Larsen
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Anne Alexander
Arthur Van Rhyen
Dennis Sheridan
Tess Derry
Carl Samuelson
Alex Abela
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Anastasia Bell
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Frank Maurer
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Susan Mullen
Bill Malone
Neil Langford
John Beccia
Steve Denneen
Glenn Peterson
Dirk Watkins
Jerald Mullen
David Morrow
Anita Judd
Carole McMillan

Erin Englund
Jennifer von Reis
Bruce Bennet
Melinda Forbes
Edith Schrader
Ann Freeman
Shirley Biconchi
Nancy Best
Lindsay Hampton
Alden F. Shiers
Charles J. Gulyeah
Geraldine Brocher
Nancy Hodges
Helen M. Bennett
Dick Warraner
James R. Stroud
John H. Gregg
Bill Millie
June Theriot
Sue Sunderland
Kevin Doyle
Larry Wright
Barbara King
Irv McMillan
Cynthia Jelenik
Joseph Hampton
Marsha Benson
Ylan de Waddell
David Krause
Gary Feleman
Eric Schug
Sonnie Walters
Lianne Hutton
Diene LaPedo
Lucinda Grayum
Jeannie Laird
Ien Marx
Will Alexander
Sally Plenzalski
John Gustafson
Jaime Chavez
Marie Van Balen
August Van Der Stad
Bonnie Wamsley
Jeff Stephens
Nancy Koren
Nathan Koren
Pat Connolly
Ann Betterson
Judith A. Whitmore
David N. Smith
Don Smith
Agatha Berwanger
Laurie Stroup
Geri Welch
Shells Wynne
Carol Gulyeah
Jack Forrest
Via Obern
Gudrun Grell
John Kelsler
Marcelle Martin
Ann Morris
Margaret Price
Hollie Marriott
Pat Sanger
Jason Tong
Don Ward
Karen Schambach
Greg Perello
Nathan Karen
Eric Schug
Jeff Stephens
Diane Owens
Jerry Hill
Marie Van Balen
Jaine Chavez
Frank Wells
Inge Geens
Lucinda Grayum
Donna Kandel
Orly Halpern
Katie Denneen
Phil Compton
Susan Blaesek
Pat Brown
Nancy Frey
Angela Flicker White
Sharon Hill
Joe Clokey

O.H.V. Riding Areas in California

*Corral Canyon; Cleveland National Forest, 1,800 Acres
*Little Rock; Angeles National Forest, 46 Acres
*Rowler Flat; Angeles National Forest, 145 Acres
*San Gabriel Canyon; Angeles National Forest, 180 Acres
*Widomar; Cleveland National Forest, 340 Acres
*Buttercup Valley; BLM - El Centro Resource Area Office, 30,000 Acres
*Dove Springs; BLM - Ridgecrest Resource Area Office, 161 Acres
*Dumont Dunes; BLM - Barstow Resource Area Office, 2,200 Acres
*El Mirage; BLM - Barstow Resource Area Office, 10,400 Acres
*Glamis/Geko; BLM - El Centro Resource Area Office, 149,000 Acres
*Jawbone; GLM - Ridgecrest Resource Area Office, 133 Acres
*Johnson Valley; BLM - Barstow Resource Area Office, 261 Acres
*Mammoth Wash; BLM - El Centro Resource Area Office, 8,000 Acres
*Plaster City; BLM - El Centro Resource Area Office, 100,000 Acres
*Razor; BLM - Barstow Resource Area Office, 32 Acres
*Rice Valley Dunes; BLM - Palm Springs - South Coast Resource Area Office, 4,000 Acres
*Spangler Hills; BLM - Ridgecrest Resource Area Office, 2,000 Acres
*Stoddard Valley; BLM - Barstow Resource Area Office, 125 Acres
*Ocotillo Wells; California Dept. of Parks & Recreation, 4,000 Acres
*Hungary Valley; California Dept. of Parks & Recreation, 5,100 Acres
*Pismo Dunes; California Dept. of Parks & Recreation, 2,000 Acres
*Moabi Regional Park; San Bernardino County, 65 Acres
Total Acres: 319,988

Greg Heck
Mary Simmons
Theresa Guinn
Michele Anderson
Marion Nelson
Monica Harris
Kathryn Schmidt
Elaine Gensson
Susan Johnson
Darlene Gastineau
Jodi Tallier
Christine Peralta
Michael Sullivan
Kathleen Hawkins
Carlos Diaz
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Steve Dauber
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National Parks - Share the Experience

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Mr. William L. Denneen
1040 Cleto Ln.
Nipomo, CA 93444-9039

DEC 16 2004

Just Go Away

The Offshore Oil Industry's Slick
Presentation Doesn't Wash

BY PAT VEESART

Well, the federal government and the big oil companies have done it again.

On Oct. 25, the federal Minerals Management Service (MMS) brought the big-oil dog and ponyshow to San Luis Obispo. About 150 angry SLO County residents showed up to hear the MMS consultant speak in soothing,

practiced tones about how much they want our input.

GUEST COMMENTARY

They called this show a COOGER Study

Workshop. COOGER is an acronym for California Offshore Oil and Gas Energy Resources. Apparently, it's also a euphemism for "off-shore oil development whether you want it or not."

It didn't take long for it to become obvious that the study is designed to make us *feel* like we're giving our input—but actually the decisions that were made long ago and they didn't include us "hicks" here on the Central Coast.

Both the MMS consultant and the MMS official at the Oct. 25 workshop admitted that the \$1.5-million COOGER study is not a policy-making document and will have no effect on the decision to develop lease sites off our coast.

"So why bother?" was asked repeatedly by audience members. I never did hear a good answer to that question.

The workshop was ostensibly held to talk about on-shore constraints to offshore oil development off of our coast, things like air quality, increased tanker activity, transportation issues, industrial "accidents" like explosions and pipeline spills, the industrialization of rural lands, impacts to wildlife habitat and threatened animal species, visual blight, and socioeconomic concerns like impacts to tourism and agriculture.

All of these issues would need to be addressed if off-shore development were to occur, but what the MMS representatives seemed to miss repeatedly is that the biggest on-shore constraint to off-shore oil development is

offshore oil proposals, we need to talk about the legacy of environmental damage that the oil companies have left here in our country.

The Guadalupe Dunes float on a sea of diluent that threatens marine wildlife, endangered shorebirds, and one of the most beautiful beaches in California.

The town of Avila Beach sits on an oil spill threatening a thriving local economy and degrading property values.

The tank farm in San Luis Obispo blew up back in the 1920s and the spill has not been cleaned up yet.

There are leaks at the marine terminal in Estero Bay, as yet not cleaned up, and there have been countless spills into local creeks and communities for years.

Tankering activity off our coast is a constant threat to one of the most celebrated and priceless coastlines in the entire world.

Oil facilities in San Ardo, Nipomo, Price Canyon, Morro Bay, Avila Beach, and others are polluting the air right now, and only god knows what else is leaking. The facilities are unspeakably ugly, as if someone intentionally tried their hardest to insult and degrade nature and twist it to making a profit at the expense of all else.

All this is particularly hard to take given the great natural beauty of our area.

To say that the oil companies have not been good guests here is a gross understatement.

The oil companies have behaved reprehensibly here since day one, covering up their

activities, buying off or bullying local government, and treating the "locals" with utter disregard. They have been "the house guests from hell," scaring the kids, kicking the cat, trashing everything they touch, eating us out of house and home.

And they won't leave. They just won't leave. We've asked them nicely, and we've asked them not so nicely, but jeez, they won't take the

hint. Instead, they propose to stay even longer; now they have a newfound "interest" in our concerns.

Give me a break. Is it really any wonder that we're upset and walk out on their "nice" meetings?

Well, I'm sorry. I hate to be rude, but the oil

The oil companies have behaved reprehensibly, covering up their activities, buying off local government, and treating locals with utter disregard.

In 1986, county voters chose not to leave the decision of building on-shore facilities that support offshore oil development to the whim of elected officials. They chose instead to pass an initiative that requires a vote of the people to approve such facilities. The oil companies fought this bitterly, but in the end, the people won at the Supreme Court level.

One would think that the feds and the oil companies could have taken a hint, but no. They blithely went ahead with proposals for new lease sites until, in 1991, some 1,800 angry Central Coast residents turned out at a hearing in Santa Maria and blasted MMS officials for ignoring their wishes. Fearing for their skins, the MMS beat a hasty retreat back to Washington and decided that maybe we were serious. As a result, no *new* lease sites are proposed in the current Five-Year Plan. Instead, they are hell-bent on developing existing leases

will take the silverware when they leave—they can't help themselves—but leave they must.

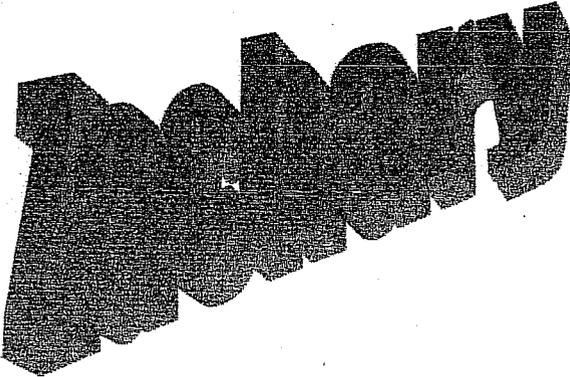
So the message to the oil companies from the Central Coast is this: Go away now!

Where to go might be a problem, since their reputation precedes them. How about Texas or Iraq? They've done so many wonderful things in Ecuador, I'm sure they love you there. Or maybe try Alaska. Of course Alaskans do more than just *threaten* to reach for their guns.

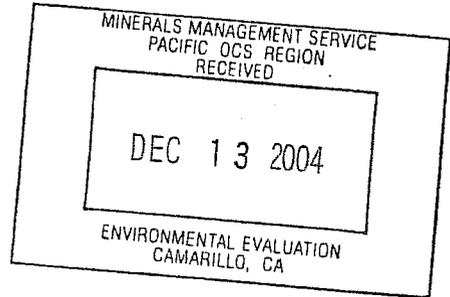
Surely there's someplace left on the planet where you can find a welcome, but that place is not here.

We do not want oil development off our coast. Not in 1986, not in 1991, not now, and not ever. Go back to Washington and develop a national energy policy that is not dependent upon wrecking our home.

Just go. A



P.O. Box 6656
Los Osos CA 93412



12/11/04

Minerals Mgmt. Service
Attn: Suspension - EA Comments
Office of Environmental Evaluation
770 Paseo Camarillo
Camarillo CA 93010-6064

To Whom It May Concern:

Please add my and my family's voices to those who contact you about offshore oil drilling. I know that you can't think that the beautiful drive along Santa Barbara's coast is somehow improved by oil rigs.

There is no choice for me between using less fuel/higher fuel costs and a beautiful coastline that's been unspoiled for millions of years.

We pick the unspoiled view every time, whatever the personal cost to us.

Sincerely,

Valerie Zachary